

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

JOSEPH JUNQUET,
Plaintiff,

Civil Action No. 5:22-cv-01076-MGL

vs.

TRUCKMOVERS.COM, INC., DEALERS
CHOICE TRUCKAWAY SYSTEM, INC.,
D/B/A "TRUCKMOVERS" OR "TRUCK
MOVERS DEPOT"; AND DENNIS
OLSON,

NOTICE OF REMOVAL

Defendants.

TO: W. HUGH MCANGUS, JR., ESQUIRE, ATTORNEY FOR PLAINTIFF

YOU WILL PLEASE TAKE NOTICE that the Defendants Truckmovers.com, Inc., Dealers Choice Truckaway System, Inc., d/b/a "Truckmovers" or "Truck Movers Depot"; and Dennis Olson (Defendants), removes the above-captioned case from the Circuit Court of Orangeburg County, South Carolina, into the United States District Court, District of South Carolina, Orangeburg Division. This removal is proper on the following grounds:

1. A civil action has been commenced and is now pending in the Circuit Court of Orangeburg County, State of South Carolina, Joseph Junquet v. Truckmovers.com, Inc., Dealers Choice Truckaway System, Inc., d/b/a "Truckmovers" or "Truck Movers Depot"; and Dennis Olson T, Civil Action Number 2022-CP-38-00326.

2. This action is one in which the United States District Courts have original jurisdiction, because the action involves a controversy which is wholly between citizens of different states, in that upon information and belief, the Plaintiff was at the time of the commencement of this action, and still is, a citizen of the State of South Carolina. The

Defendants Truckmovers.com, Inc., Dealers Choice Truckaway System, Inc., d/b/a “Truckmovers” or “Truck Movers Depot”; and Dennis Olson was at the time incorporated with its principal place of business in a State other than South Carolina.

3. The Defendants are entitled to removal of the aforesaid action to this Court because complete diversity of citizenship exists between the Plaintiff and the Defendants and the amount in the controversy exceeds the jurisdictional amount required by 28 U.S.C. § 1332.

4. This action was commenced by service of the Summons and Complaint, attached hereto as Exhibit A, effectuated by Certified Mail on March 1, 2022. Pursuant to 28 U.S.C. § 1446, this Notice of Removal is filed within thirty (30) days of service upon the Defendant of the initial pleadings setting forth the claim upon which relief is requested. This Defendant will serve an Answer or responsive pleading as provided by law.

5. The Honorable Winnifa Brown-Clark, Clerk of Court of Orangeburg County, has been provided a copy of this Notice of Removal.

WHEREFORE, this Defendant gives notice that the aforesaid action is removed from the Circuit Court of Orangeburg County, State of South Carolina, and to this Court for trial and determination.

[Signature block to follow]

MCANGUS GOUDELOCK & COURIE, L.L.C.

s/Andrew L. Richardson, Jr.

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ATTORNEY FOR DEFENDANTS

TRUCKMOVERS.COM, INC., DEALERS

CHOICE TRUCKAWAY SYSTEM, INC., D/B/A

“TRUCKMOVERS” OR “TRUCK MOVERS

DEPOT”; AND DENNIS OLSON

April 4, 2022

Columbia, South Carolina